

**Worksheet  
Interim  
Documentation of Land Use Plan Conformance and NEPA Adequacy  
(DNA)**

U.S. Department of the Interior Bureau of Land Management

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**Note:** This Worksheet is to be completed consistent with the policies stated in the Instruction Memorandum entitled, "Documentation of Land Use Plan Conformance and National Environmental Policy Act (NEPA) Adequacy" transmitting this Worksheet and the "Guidelines for using the DNA Worksheet," located at the end of the Worksheet.

**A. Describe the Proposed Action**

The proposed action is to renew the 10 year grazing lease (#361039) for Jan Wright, which covers the 900 acre (BLM) Harpold Chaining (0836) allotment and 1249 acre Bryant-Horton (0837) allotment, in accordance with 43 CFR 4110.1, 4110.2-1(d) and (e), 4130.2, and 4130.3. The current grazing lease expires on 2/28/00. The recognized base properties for this grazing lease have been and continue to be owned by Ms. Wright. The term of the renewed lease will be 3/1/2000 through 2/28/2010; 10 years as allowed under 43 CFR subpart 4130.2(d) of the grazing regulations. Both of these allotments are located on the north end of Bryant Mountain, 2-6 miles south of Bonanza, Oregon (see attached map). Both have intermingled private lands, with the Bryant-Horton allotment containing better than 50% private lands. The Harpold Chaining only contains 40 acres of private lands within its boundaries.

The parameters of the renewed lease will be the same as the previous lease: a season of use of 5/1 - 5/31 (96 AUMs) for the Harpold Chaining and 6/1 - 7/9 (130 AUMs) for Bryant-Horton. Typically, the lessee runs the same group of cattle on both allotments. The renewed grazing lease has grazing parameters virtually identical to those outlined and approved in the 1995 Klamath Falls R.A. ROD/RMP/RPS (see below).

**B. Land Use Plan (LUP) Conformance**

*LUP Name\*:* Klamath Falls R.A. Resource Management Plan and Environmental Impact Statement (KFRA RMP/EIS dated September 1994)  
*Date Approved:* June 1995 via the Klamath Falls Resource Area Record of Decision and Resource Management Plan and Rangeland Program Summary (KFRA ROD/RMP/RPS)

*\* List applicable LUPs (e.g., Resource Management Plans and activity, project, management, or program plans, or applicable amendments thereto)*

☐ *The proposed action is in conformance with the applicable LUPs because it is specifically provided for in the following LUP decisions:*

The KFRA ROD/RMP/RPS lists the grazing parameters for both allotments on page H-33 of Appendix H. Those parameters are virtually identical to the proposed action and thus, the grazing lease is in conformance with the primary land use plan for the Klamath Falls Resource Area. (The only difference is the plan has a season of use on Bryant-Horton of 6/1-6/30 and the lease is 6/1-7/9; a difference that is considered insignificant and well within the flexibility that the BLM allows due to the varying weather and growth conditions of any given year.)

In addition, the ROD/RMP/RPS says on page 62 to “Provide for livestock grazing in an environmentally sensitive manner, consistent with other objectives and land use allocations. Resolve resource conflicts and concerns and **ensure that livestock grazing use is consistent with the objectives and direction found in Appendix H (Grazing Management)**”. (emphasis added) Also later on that same page is the following: “Provide for initial levels of livestock grazing within the parameters outlined, by allotment, in Appendix H.” This lease renewal meets that direction, until an allotment evaluation and/or health standards assessment determines differentl (discussed later).

☐ *The proposed action is in conformance with the LUP, even though it is not specifically provided for (in the below referenced sections), because it is clearly consistent with the following LUP decisions (objectives, terms, and conditions):*

N/A - the action is specifically provided for in the LUP.

**C. Identify applicable NEPA documents and other related documents that cover the proposed action.**

*List by name and date all applicable NEPA documents that cover the proposed action:*

*Klamath Falls R.A. Resource Management Plan and Environmental Impact Statement (KFRA RMP/EIS dated September 1994) approved via the June 1995 Klamath Falls Resource Area Record of Decision and Resource Management Plan and Rangeland Program Summary (KFRA ROD/RMP/RPS). This is the overall plan for the Klamath Falls Resource Area.*

*List by name and date other documentation relevant to the proposed action (e.g., biological assessment, biological opinion, watershed assessment, allotment evaluation, and monitoring report).*

None additional.

**D. NEPA Adequacy Criteria**

**1. Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed? Is the current proposed action located at a**

***site specifically analyzed in an existing document?***

*Documentation of answer and explanation:*

The proposed action (lease renewal) is consistent with and the same as the grazing management identified in the RMP/EIS Preferred Alternative (called the “Proposed Resource Management Plan” or PRMP; specifics by allotment found in Appendix L- with the Ketcham allotment on L-33) and affirmed and implemented by the ROD/RMP/RPS (allotment specific information found in Appendix H - page H-33). Environmental impacts of grazing, for all alternatives, is found in Chapter 4 - “Environmental Consequences” (4-1 through 4-143) - of the RMP/EIS.

***2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current proposed action, given current environmental concerns, interests, and resource values?***

*Documentation of answer and explanation:*

The proposed action (lease renewal) lies within the range of various alternatives identified and analyzed in the RMP/EIS (summarized in table S-1 “Comparisons of Allocations and Management by Alternative”, pages 18-50; and S-2 “Summary of Environmental Consequences by Alternative”, pages 52-53). This array and range of alternatives included the No Action alternative (status quo), five other alternatives (A through E) that covered a span of management from a strong emphasis on commodities production to a strong emphasis on resource protection/preservation, and the PRMP that emphasizes a balanced approach of producing an array of socially valuable products within the concept of ecosystem management. Since this plan is relatively recent, it more than adequately reflects “current environmental concerns, interests, and resource values”.

***3. Is the existing analysis valid in light of any new information or circumstances?***

*Documentation of answer and explanation:*

A review was conducted to determine if any new information, studies, and analyses would materially differ from the data in the earlier analysis for these allotments during the RMP/EIS process. Included in these categories, and completed or extended since the date of the ROD/RMP/RPS, are the following:

No new information (post-6/95) was found specific to either the Harpold Chaining or Bryant-Horton allotment.

However, the following information is pertinent to the full addressing of this NEPA adequacy “question”:

- Ongoing analyses in the Interior Columbia Basin Ecosystem Management Plan (ICBEMP) has not indicated any new significant information that would modify the management direction in this allotment.

- Both of these allotments are low priority - "C" category (custodial) - allotments and as such are not being actively monitored, besides periodic use supervision. This is keeping with ongoing guidance and policy direction to concentrate our monitoring and management efforts on high priority areas, to wit, "I" (improve) and to some extent, "M" (maintain) category allotments. (Categorization is explained in the ROD/RMP, Appendix H, pages H-69 and H-70.) In addition, there have been no recent indications that either allotment has critical resource related problems that need aggressive monitoring (see Question #5, second paragraph for information about the two LUP objective for the Harpold Chaining allotment).

- In accordance with 43 CFR 4180, the Klamath Falls Resource Area is in the process of implementing the Standards for Rangeland Health and Guidelines for Grazing Management (S&G's), as developed by the Klamath PAC. A "Rangeland Health Standards Assessment" is scheduled for both allotments during FY 2005. These assessments will ascertain whether we are meeting, not meeting, or making significant progress towards meeting, all 5 of the Standards for Rangeland Health. Rangeland (or other) monitoring may be performed on these allotments in the future if additional information is deemed necessary to adequately assess the areas.

In summary, the existing analysis is considered valid for both allotments at this time, though may (or may not) be modified by the results of the future Rangeland Health Standards assessment.

**4. Does the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current proposed action?**

*Documentation of answer and explanation:*

The RMP/EIS and subsequent ROD/RMP/RPS designated domestic livestock grazing as a principle or major use for this allotment under the principle of multiple use on a sustained yield basis in accordance with FLPMA. The development of the Proposed Resource Management Plan in the RMP/EIS, as adjusted or affirmed by the ROD/RMP/RPS, meets NEPA standards for impact analysis. The methodology and analyses employed in the RMP/EIS are still considered valid as this planning effort is relatively recent (June 1995) and considered up to date procedurally. In addition, all the rangeland monitoring, studies, and survey methods utilized in the general area prior to and during the planning process continue to be accepted (or required) BLM methods and procedures.

**5. Are the direct and indirect impacts of the current proposed action substantially unchanged from those identified in the existing NEPA document(s)? Does the existing NEPA document analyze site-specific impacts related to the**

***current proposed action?***

*Documentation of answer and explanation:*

The proposed action is consistent with the RMP/EIS, as affirmed or adjusted by the ROD/RMP/RPS. The impacts of livestock grazing were analyzed in most of the major sections of Chapter 4 - Environmental Consequences (pages 4-1 through 4-143) in the RMP/EIS. No new information has come to light since completion of the plan that would indicate that the previously analyzed direct/indirect impacts would be substantially different.

The details of the proposed action were also covered specifically in Appendix H - Grazing Management and Rangeland Program Summary (both allotments are on page H-33) of the ROD/RMP/RPS. In that section the following two "Identified Resources Conflicts/Concerns" were listed for Harpold Chaining: "Under current management the range condition, level or pattern of utilization, and/or season-of-use may be unacceptable; or carrying capacity may be exceeded." and "Critical deer winter range occurs in allotment." The respective accompanying "Management Objectives" were: "Maintain or improve rangeland condition and productivity through a change in grazing management practices, timing, and/or level of active use." and "Management systems should reflect the importance of deer winter range."

Both of these objectives are covered within several of the 5 Standards for Rangeland Health and will be assessed during the "Rangeland Health Standards Assessment" scheduled for 2005. Specifically, Standard 2 "Watershed Function - Upland Areas" and Standard 5 - "Native, T&E, and Locally Important Species" directly address the two allotment specific ROD/RMP objectives. We currently have no specific information that would lead us to believe any conditions or impacts are different now than that identified during the RMP process, with the exception of informal use supervision observations that conditions are not declining.

***6. Are the cumulative impacts that would result from implementation of the current proposed action substantially unchanged from those analyzed in the existing NEPA document(s)?***

*Documentation of answer and explanation:*

The proposed action as analyzed in the PRMP of the RMP/EIS, as affirmed or adjusted by the ROD/RMP/RPS, would not change analysis of cumulative impacts. Any adverse cumulative impacts are the same as and within the parameters of those identified and accepted in that earlier planning effort for the two allotments grazing use, since the proposed action was specifically analyzed in the RMP/EIS. In addition, ongoing analyses in the Interior Columbia Basin Ecosystem Management Plan (ICBEMP) has not indicated any cumulative impacts beyond those anticipated in the earlier analyses. (In addition, the

**7. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?**

The KFRA RMP/EIS and ROD/RMP/RPS were distributed to all interested publics and other government agencies for review. Since the proposed lease re-issuance is almost precisely as listed in the LUP and that plan went through all of the appropriate and legally required public/agency review, public involvement is considered at least adequate.

No specific public involvement, or “interested public” status (under the grazing regulations at 43 CFR 4100.0-5), has ever been requested for either the Harpold Chaining or Bryant-Horton allotments.

Name	Title
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## Conclusion

*Note: If you found that one or more of these criteria is not met, you will not be able to check this box.*

\_\_\_\_ Teresa A. Raml \_\_\_\_\_  
Manager, Klamath Falls Resource Area

Date

*Note: The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision.*

## **Guidelines for Using the DNA Worksheet and Evaluating the NEPA Adequacy Criteria**

These guidelines supplement the policies contained in the Instruction Memorandum entitled "Documentation of Land Use Plan Conformance and National Environmental Policy Act (NEPA) Adequacy". During preparation of this worksheet, if you determine that one or more of the criteria are not met, you do not need to complete the Worksheet. If one or more of these criteria is not met, you may reject the proposal, or complete appropriate NEPA compliance (EA, EIS, Supplemental EIS, or CX if applicable) and plan amendments before proceeding with the proposed action. Documenting why the criterion (criteria) has (have) not been met may be beneficial in preparing new or supplemental NEPA documents, however.

**Criterion 1. Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed? Is the current proposed action at a site specifically analyzed in an existing NEPA document?** In the limited situations in which an existing NEPA document(s) can properly be relied upon without supplementation, explain whether and how the existing documents analyzed the proposed action (include page numbers). If there are differences between the actions included in existing documents and the proposed action, explain why they are not considered to be substantial.

**Criterion 2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current proposed action, given current environmental concerns, interests and resource values?** Explain whether the alternatives to the current proposed action that were analyzed in the existing NEPA documents and associated record constitute a reasonable range of alternatives with respect to the current proposed action, and if so, how. Identify how current issues and concerns were addressed within the range of alternatives in existing NEPA documents. If new alternatives are being proposed by the public to address current issues and concerns, and you conclude they do not need to be analyzed, explain why.

**Criterion 3. Is the existing analysis valid in light of any new information or circumstances?**

New information or circumstances could include the following. If any of the listed items below are applicable, you need to determine whether it (they) constitute(s) new information or circumstances.

- a. New standards or goals for managing resources. Standards and goals include, but are not limited to: BLM's land health standards and guidelines, recovery plans for listed species prepared by the Fish and Wildlife Service or National Marine Fisheries Service, requirements contained in a biological opinion or conference report related to Section 7 of the Endangered Species Act, and the requirement to address disproportionate impacts on minority populations and low income communities (E.O. 12898).
- b. Changes in resource conditions within the affected area the existing NEPA analyses were conducted, e.g., changes in habitat condition and trend; listed, proposed, candidate, and Bureau designated sensitive species; water quality, including any identified impaired water bodies under Section 303 of the Clean Water Act; air quality; vegetation condition and trend; soil stability; visual quality; cultural resource condition; and wildlife population trend(s); etc.
- c. Changes of resource-related plans, policies, or programs of State and local governments, Indian tribes, or other federal agencies.
- d. Designations established in the affected area since the existing NEPA analysis and documentation was prepared. Designations include, but are not limited to wilderness, wilderness study areas, National Natural Landmarks, National Conservation Areas, National Monuments, National Register properties, Areas of Critical Environmental Concern, and Research Natural Areas.

**Criterion 4. Do the methodology and analytical approach used in the existing NEPA document continue to be appropriate for the proposed action?** Explain how the methodologies and analytical approach used in the existing NEPA document are current and sufficient for supporting approval of the proposed action. If valid new technologies and methodologies (e.g. air quality modeling) exist, explain why it continues to be reasonable to rely on the method previously used.



**Criterion 5. Are the direct and indirect impacts of the current proposed action substantially unchanged from those analyzed in the existing NEPA document(s)? Does the existing NEPA document analyze site-specific impacts related to the current proposed action?** Review the impact analysis in the existing NEPA document(s). Explain how the direct and indirect impacts of the proposed action are analyzed in the existing NEPA documents, and would, or would not, differ from those identified in the existing NEPA document. Consider the effect new information or circumstances may have on the environmental impacts predicted in the existing NEPA document. \_

**Criterion 6. Are the cumulative impacts that would result from implementation of the proposed action substantially unchanged from those identified in the existing NEPA document(s)?** Would the current proposed action, if implemented, change the cumulative impact analysis? Consider the impacts analysis in existing NEPA documents, the effects of relevant activities that have been implemented since existing NEPA documents were completed and the effects of the current proposed action.

**Criterion 7. Is the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?** Explain how the nature of public involvement in previous NEPA documents continues to be adequate and valid in light of current issues, concerns, views, and controversies.